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10
11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF WASHINGTON

13 NICHOLAS ROLOVICH,
14
15 Plaintiff,
16 v.
17 WASHINGTON STATE
UNIVERSITY,
18 Defendant.

No. 2:22-cv-00319-TOR

STIPULATED MOTION AND
[PROPOSED] ORDER TO
CONTINUE CASE
DEADLINES AND AMEND
SCHEDULING ORDER

August 19, 2024
Without Oral Argument

19
20 Plaintiff Nicholas Rolovich and Defendant Washington State University
21 submit this stipulated motion to continue the dispositive motions deadline. Since
22 each party intends to file a motion for summary judgment, the Parties propose a
23 briefing schedule for cross-motions for summary judgment below.

24 STIP. MOTION AND [PROP.] ORDER TO
CONTINUE CASE DEADLINES AND
25 AMEND SCHEDULING ORDER – 1
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I. AUTHORITY

Under Federal Rule of Civil Procedure 16(b)(4), the Court may amend a scheduling order upon a showing of good cause. *See* ECF No. 44. Good cause exists to continue the dispositive motions deadline and issue an amended case scheduling order. The extension and briefing schedule for cross-motions for summary judgment will avoid duplicative filings and provide the Court with sufficient materials to rule on the parties' summary judgment motions.

II. STIPULATED PORTION OF MOTION

For the reasons stated above, the Parties submit this stipulated motion to establish a briefing schedule for cross-motions for summary judgment. The Parties propose the following amended deadlines, which are reflected in the proposed Order submitted with this Motion.

Case Event	Current Event Date	Proposed Amended Date
Dispositive Motion Deadline	09/10/2024	10/14/2024
Plaintiff Motion for Partial Summary Judgment (Partial MSJ)		09/23/2024
Defendant's Combined Response to Plaintiff's Partial MSJ/Cross-Motion for Summary Judgment (Cross-MSJ)		10/14/2024
Plaintiff's Combined Reply in Support of Partial MSJ/Response to Defendant's Cross-MSJ		11/04/2024

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1 2 3 4	Defendant's Reply in Support of Cross-MSJ		11/18/2024
5 6 7 8	Hearing Date	50 days from filing would be 10/30/24	50 days from filing would be 11/12/24

III. CONCLUSION

As described above, good cause exists for these case schedule changes, and the Parties believe they are necessary for the efficient resolution of this case.

STIPULATED to this 19th day of August, 2024.

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s/Zachary J. Pekelis

s/Job Seese

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STIP. MOTION AND [PROP.] ORDER TO
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ORDER

This matter having come before the Court by joint stipulated motion of counsel, and for good cause shown, IT IS ORDERED that the case schedule of the above-entitled case shall be amended as reflected below.

Case Event	Current Event Date	Amended Date
Dispositive Motion Deadline	09/10/2024	09/23/2024
Plaintiff Partial MSJ		09/23/2024
Defendant's Combined Response to Partial MSJ/Cross-MSJ		10/14/2024
Plaintiff's Combined Reply in Support of Partial MSJ/Response to Defendant's Cross-MSJ		11/04/2024
Defendant's Reply in Support of Cross-MSJ		11/18/2024

DATED this ____ day of August, 2024.

HONORABLE THOMAS O. RICE
UNITED STATES DISTRICT JUDGE

STIP. MOTION AND [PROP.] ORDER TO
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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2024, I electronically filed the foregoing document with the Clerk of the United States District Court using the CM/ECF system which will send notification of such filing to all parties who are registered with the CM/ECF system.

s/ Zachary J. Pekelis
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STIP. MOTION AND [PROP.] ORDER TO
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